

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONRAI MEMORY LIMITED,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:21-cv-00167-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

LG ELECTRONICS INC., LG
ELECTRONICS U.S.A., INC.,

Defendants.

Case No. 6:21-cv-00168-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 6:21-cv-00169-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

DELL TECHNOLOGIES INC.,

Defendant.

Case No. 6:21-cv-00361-ADA

SONRAI MEMORY LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:21-cv-401-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

KINGSTON TECHNOLOGY COMPANY,
INC. and KINGSTON TECHNOLOGY
CORPORATION

Defendant.

Case No. 6:21-cv-00167-ADA

**DECLARATION OF DONGHWAN LEE IN SUPPORT OF
DEFENDANTS' OPPOSED MOTION TO STAY
PENDING FINAL RESOLUTION OF PLAINTIFF'S MANUFACTURER LAWSUITS**

I, Donghwan Lee, hereby declare as follows:

1. I am over 18 years of age and competent to make this declaration.
2. I have been employed at LG Electronics Inc. since 2003. My current position is Senior Manager. My responsibilities include managing patent licensing and litigation matters.
3. I provide this declaration on behalf of LG Electronics Inc., and LG Electronics U.S.A., Inc. ("LG") with respect to *Sonrai Memory Ltd. v. LG Electronics Inc., and LG Electronics U.S.A., Inc.*, Case No. 6:21-cv-00168-ADA. The statements in this declaration are based on my personal knowledge, my review of corporate records maintained by LG in the ordinary course of business and/or my discussions with LG employees. If called to testify as a

witness, I could and would testify competently and truthfully to each of the statements under oath.

4. I understand, based on the complaint and its attachments, that the plaintiff has filed a lawsuit against LG claiming that certain LG products that include SanDisk/Toshiba 64L 3D NAND flash chips infringe U.S. Patent Nos. 6,724,241 (the “’241 patent”). Plaintiff alleges that SanDisk/Toshiba 64L 3D NAND flash chips with the die identifier FRN1256G (“Accused Kioxia and Western Digital Chips”) infringe the ’241 patent.

5. I further understand, based on the complaints and attachments to the complaints, that plaintiff has filed lawsuits against Kioxia Corporation (formerly Toshiba Memory Corporation) and Kioxia America, Inc. (collectively, “Kioxia”) and Western Digital Technologies Inc. and Western Digital Corporation (“Western Digital”) of infringing the ’241 patent based on the Accused Kioxia and Western Digital Chips.

6. Kioxia and Western Digital supply the Accused Kioxia and Western Digital Chips to LG. Kioxia and Western Digital are the only sources of the Accused Kioxia and Western Digital Chips to LG.

7. LG does not have the ability to make any modifications to the circuits of the Accused Kioxia and Western Digital Chips accused of infringing the ’241 patent and LG integrates into the LG products the Accused Kioxia and Western Digital Chips “as is” with respect to their circuit designs.

8. LG does not have possession, custody, and control of the factual information and related documentation that shows the design, manufacture and operation of the Accused Kioxia and Western Digital Chips.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

Executed on November 24, 2021 in Seoul, Korea.

A handwritten signature in black ink, consisting of stylized, flowing cursive letters, positioned above a horizontal line.

Donghwan Lee